

DEORCHIS & PARTNERS, LLP
2355 Main Street
South Chatham, MA 02659
(508) 432-2121

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANZAS CORPORATION d/b/a DHL DANZAS
AIR & OCEAN,

Plaintiff,

- against -

KROFTA TECHNOLOGIES CORPORATION,
PETER R. KIRCHNER, MICHAEL NOYES,
NORTHEAST FABRICATORS & MECHANICAL
SERVICES, LLC, and DANIEL SHEPARD,

Defendants.

NOTICE OF FILING CERTIFICATION IN COMPLIANCE
WITH LOCAL RULE 16.1(D)(3)

PLEASE TAKE NOTICE that the plaintiff DANZAS CORPORATION d/b/a DHL DANZAS AIR & OCEAN hereby files the Certification in Compliance with Local Rule 16.1(D)(3). The same is attached as Exhibit "A".

Dated: New York, New York
February 2, 2005

DEORCHIS & PARTNERS, LLP
Attorneys for Plaintiff

By: 

John K. Fulweiler
2355 Main Street
South Chatham, MA 02659
(508) 432-2121

TO: Simons, Smith & Gerrard
Benjamin Smith, Esq.
75 North Street
Pittsfield, MA 01201
413-442-2731 - Tel.
413-443-7409 - Fax.

Weinberg & Garber, P.C.
John E. Garber, Esq.
71 King Street
Northampton, MA 01060
413-582 6886 - Tel.
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EXHIBIT A

DEORCHIS & PARTNERS, LLP
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NORTHEAST FABRICATORS & MECHANICAL
SERVICES, LLC, and DANIEL SHEPARD,

Defendants.

Civil Case no.: 04-30219-MAP

CERTIFICATION IN COMPLIANCE WITH LOCAL RULE 16.1(D)(3)

I, Victor Owusu, under oath hereby deposes and states as follows:

1. I am Legal Counsel for the Plaintiff Danzas Corporation d/b/a DHL Danzas Air & Ocean.
2. I have conferred with our retained counsel in this matter with regard to establishing a budget for the cost of conducting the full course and alternative course of litigation as well as the various alternative courses of resolution such as Alternative Dispute Resolution ("ADR") and Mediation. The Plaintiff needs to develop further information before it can decide whether this case is appropriate for settlement, ADR or full litigation.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 26th DAY
OF January, 2005.



Victor Owusu, Esq.
DHL EXPRESS
1200 South Pine Island Road
Plantation, FL 33324

DECLARATION OF SERVICE BY MAIL

Linda Salerno, declares that:

I am not a party to this action, am over 18 years of age, and reside in Staten Island, New York. I am a secretary with DeOrchis & Partners, LLP, the attorneys for the within named Plaintiff, with offices at 61 Broadway, 26th Floor, New York, New York 10006.

On February 2, 2005 I served upon:

Benjamin Smith, Esq.
Simons, Smith & Gerard
75 North Street, Ste. 320
Pittsfield, MA 01201

Weinberg & Garber, P.C.
John E. Garber, Esq.
71 King Street
Northampton, MA 01060

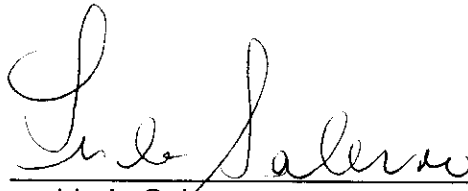
a true copy of the annexed:

1. Notice of Filing Certification in Compliance with Local Rule 16.1(D)(3)

by depositing the same in a sealed and postage prepaid wrapper, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated above.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 2, 2005.



Linda Salerno